

Fill in this information to identify the case:

Debtor 1 Johnathon Page Flattum

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN DISTRICT OF WASHINGTON  
(State)

Case number 18-43493-BDL

## Form 4100R

### Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

#### Part 1: Mortgage Information

Name of creditor: Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust

Court claim no. (if known): 12

Last 4 digits of any number you use to identify the debtor's account: 0619

Property Address: 6619 S Junett St  
Number Street

Tacoma, WA 98409  
City State ZIP Code

#### Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

#### Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 01/01/2023  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. Total. Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: \_\_\_\_\_

MM / DD / YYYY

Debtor 1      Johnathon Page Flattum  
\_\_\_\_\_  
First Name      Middle Name      Last Name

Case number (if known)      18-43493-BDL  
\_\_\_\_\_

**Part 4:** Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5:** Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box.*

- ☐ I am the creditor.  
☐ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X**

/s/ Lance E. Olsen  
\_\_\_\_\_  
Signature

Date    12/08/2022  
\_\_\_\_\_

Print    Lance E. Olsen  
\_\_\_\_\_  
First Name      Middle Name      Last Name

Title    Attorney for Creditor  
\_\_\_\_\_

Company    McCarthy & Holthus, LLP  
\_\_\_\_\_

If different from the notice address listed on the proof of claim to which this response applies:

Address    108 1<sup>st</sup> Avenue South, Ste. 300  
\_\_\_\_\_  
Number      Street  
Seattle, WA 98104  
\_\_\_\_\_  
City      State      ZIP Code

Contact phone    206-596-4856  
\_\_\_\_\_

Email    bknotice@mccarthyholthus.com  
\_\_\_\_\_

**CERTIFICATE OF SERVICE**

On 12/8/2022, I served the foregoing **RESPONSE TO NOTICE OF FINAL CURE PAYMENT** on the following individuals by electronic means through the Court's ECF program

**TRUSTEE**

Michael G. Malaier  
ecfcomputer@chapter13tacoma.org

**DEBTOR'S COUNSEL**

Christina L. Henry  
mainline@hdm-legal.com  
chenry@hdm-legal.com

**I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.**

\_\_\_\_\_  
/s/ Andrei Mihai

Andrei Mihai

On 12/8/2022, I served the foregoing **RESPONSE TO NOTICE OF FINAL CURE PAYMENT** on the following individuals by depositing true copies thereof in the United States mail at San Diego, California, enclosed in a sealed envelope, with postage paid, addressed as follows:

**DEBTOR**

Johnathon Page Flattum, 6619 S Junett St, Tacoma, WA 98409

**I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.**

Dated: 12/8/2022

\_\_\_\_\_  
/s/ Hue Banh

Hue Banh